

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity  
as SECRETARY OF THE U.S. DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, et al.

Defendants.

Case No. 1:25-Civ-00196

**NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff States write to notify the Court of supplemental authority relevant to their pending Motion for a Preliminary Injunction, ECF No. 43: a memorandum and order issued earlier today by the U.S. District Court for the District of Massachusetts granting states' and consolidated plaintiffs' motions for a preliminary injunction in *State of New York v. Linda McMahon*, Case No. 1:25-cv-10601-MJJ, ECF No. 128 (D. Mass. May 22, 2025) (Joun, J.), which challenges mass terminations at and reorganization of the U.S. Department of Education. Under the Order, among other things, the defendants are enjoined from carrying out the challenged reduction-in-force, and federal employees whose employment was terminated as part of the reduction-in-force must be reinstated to restore the Department to the status quo. Plaintiff States submit this in-circuit supplemental authority due to the analogous factual posture involving the alleged significant dismantling of another cabinet-level agency and the similarities in legal arguments raised by the parties regarding agency and executive authority. Plaintiff States note that government has filed a notice of appeal of this decision. *See id.* ECF No. 130.

Dated: May 22, 2025

**NICHOLAS W. BROWN**  
Attorney General of Washington

By: /s/ Spencer W. Coates  
Spencer W. Coates  
Kelsey E. Endres  
*Assistant Attorneys General*  
Cynthia Alexander  
William McGinty  
*Deputy Solicitors General*  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104-3188  
(206) 464-7744  
[spencer.coates@atg.wa.gov](mailto:spencer.coates@atg.wa.gov)  
[kelsey.endres@atg.wa.gov](mailto:kelsey.endres@atg.wa.gov)  
[cynthia.alexander@atg.wa.gov](mailto:cynthia.alexander@atg.wa.gov)  
[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)

*Counsel for the State of Washington*

**PETER F. NERONHA**  
Attorney General for the State of Rhode  
Island

/s/ Sarah Rice  
Kathryn M. Sabatini (RI Bar No. 8486)  
Chief, Civil Division  
Sarah Rice (RI Bar No. 10588)  
Deputy Chief, Public Protection Bureau  
Chandana Pandurangi (RI Bar No. 10922)  
Special Assistant Attorney General  
150 South Main Street  
Providence, RI 02903  
Phone: (401) 274-4400  
Fax: (401) 222-2995  
[ksabatini@riag.ri.gov](mailto:ksabatini@riag.ri.gov)  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[cpandurangi@riag.ri.gov](mailto:cpandurangi@riag.ri.gov)

Respectfully submitted,

**LETITIA JAMES**  
Attorney General for the State of New York

By: /s/ Molly Thomas-Jensen  
Molly Thomas-Jensen  
Jessica Ranucci  
*Special Counsel*  
Rabia Muqaddam  
*Special Counsel for Federal Initiatives*  
Andres Ivan Navedo  
Molly Brachfeld  
*Assistant Attorneys General*  
28 Liberty St.  
New York, NY 10005  
(929) 638-0447  
[rabia.muqaddam@ag.ny.gov](mailto:rabia.muqaddam@ag.ny.gov)  
[molly.thomas-jensen@ag.ny.gov](mailto:molly.thomas-jensen@ag.ny.gov)  
[jessica.ranucci@ag.ny.gov](mailto:jessica.ranucci@ag.ny.gov)  
[ivan.navedo@ag.ny.gov](mailto:ivan.navedo@ag.ny.gov)  
[molly.brachfeld@ag.ny.gov](mailto:molly.brachfeld@ag.ny.gov)

*Counsel for the State of New York*

**KRISTIN K. MAYES**  
Attorney General for the State of Arizona

By: /s/ Alexa Salas  
Alexa Salas  
*Assistant Attorney General*  
2005 North Central Avenue  
Phoenix, Arizona 85004  
(602) 542-3333  
[Alexa.Salas@azag.gov](mailto:Alexa.Salas@azag.gov)  
[ACL@azag.gov](mailto:ACL@azag.gov)

*Counsel for the State of Arizona*

*Counsel for the State of Rhode Island*

**ROB BONTA**

Attorney General for the State of California

By: /s/ Crystal Adams

Crystal Adams

*Deputy Attorney General*

Michael L. Newman

Neli Palma

*Senior Assistant Attorneys General*

Kathleen Boergers

Virginia Corrigan

Srividya Panchalam

*Supervising Deputy Attorneys General*

Jesse Basbaum

Jeanelly Orozco Alcala

*Deputy Attorneys General*

1515 Clay Street

Oakland, CA 94612-1499

(510) 879-3428

[Crystal.Adams@doj.ca.gov](mailto:Crystal.Adams@doj.ca.gov)

[Michael.Newman@doj.ca.gov](mailto:Michael.Newman@doj.ca.gov)

[Neli.Palma@doj.ca.gov](mailto:Neli.Palma@doj.ca.gov)

[Kathleen.Boergers@doj.ca.gov](mailto:Kathleen.Boergers@doj.ca.gov)

[Virginia.Corrigan@doj.ca.gov](mailto:Virginia.Corrigan@doj.ca.gov)

[Srividya.Panchalam@doj.ca.gov](mailto:Srividya.Panchalam@doj.ca.gov)

[Jesse.Basbaum@doj.ca.gov](mailto:Jesse.Basbaum@doj.ca.gov)

[Jeanelly.OrozcoAlcala@doj.ca.gov](mailto:Jeanelly.OrozcoAlcala@doj.ca.gov)

*Counsel for the State of California*

**WILLIAM TONG**

Attorney General of the State of  
Connecticut

By: /s/ Michael K. Skold

Michael K. Skold

Solicitor General

165 Capitol Ave

Hartford, CT 06106

(860) 808-5020

[Michael.skold@ct.gov](mailto:Michael.skold@ct.gov)

*Counsel for the State of Connecticut*

**PHILIP J. WEISER**

Attorney General of Colorado

By: /s/ Tanya E. Wheeler

Tanya E. Wheeler

*Associate Chief Deputy Attorney General*

1300 Broadway, #10

Denver, CO 80203

(720) 508-6000

[tanja.wheeler@coag.gov](mailto:tanja.wheeler@coag.gov)

*Counsel for the State of Colorado*

**KATHLEEN JENNINGS**

Attorney General of the State of Delaware

By: /s/ Vanessa L. Kassab

Ian R. Liston

*Director of Impact Litigation*

Vanessa L. Kassab

*Deputy Attorney General*

Delaware Department of Justice

820 N. French Street

Wilmington, DE 19801

(302) 683-8899

[vanessa.kassab@delaware.gov](mailto:vanessa.kassab@delaware.gov)

**BRIAN L. SCHWALB**

Attorney General for the District of  
Columbia

By: /s/ Andrew C. Mendrala

Andrew C. Mendrala  
Assistant Attorney General  
Public Advocacy Division  
Office of the Attorney General for the  
District of Columbia  
400 Sixth Street, NW  
Washington, D.C. 20001  
(202) 724-9726  
[Andrew.mendrala@dc.gov](mailto:Andrew.mendrala@dc.gov)

*Counsel for the District of Columbia*

**KWAME RAOUL**

Attorney General of the State of Illinois

By: /s/ Caitlyn G. McEllis

Caitlyn G. McEllis  
Senior Policy Counsel  
Katharine P. Roberts  
Assistant Attorney General  
Office of the Illinois Attorney General  
115 S. LaSalle Street  
Chicago, IL 60603  
312-814-3000  
[Caitlyn.McEllis@ilag.gov](mailto:Caitlyn.McEllis@ilag.gov)

*Counsel for the State of Illinois*

**ANTHONY G. BROWN**

Attorney General for the State of Maryland

By: /s/ Michael Drezner

Michael Drezner  
Senior Assistant Attorney General  
Federal Accountability Unit  
Office of the Attorney General  
200 Saint Paul Place  
Baltimore, Maryland 21202  
(410) 576-6959

*Counsel for the State of Delaware*

**ANNE E. LOPEZ**

Attorney General for the State of Hawai'i

By: /s/ Kaliko 'onālani D. Fernandes

David D. Day  
Special Assistant to the Attorney General  
Kaliko 'onālani D. Fernandes  
Solicitor General  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
[david.d.day@hawaii.gov](mailto:david.d.day@hawaii.gov)  
[kaliko.d.fernandes@hawaii.gov](mailto:kaliko.d.fernandes@hawaii.gov)

*Counsel for the State of Hawai'i*

**AARON M. FREY**

Attorney General for the State of Maine

By: /s/ Margaret Machaiek

Margaret Machaiek  
Assistant Attorney General  
Office of the Attorney General  
6 State House Station  
August, ME 04333-0006  
Tel.: 207-626-8800  
Fax: 207-287-3145  
[margaret.machaiek@maine.gov](mailto:margaret.machaiek@maine.gov)

*Counsel for the State of Maine*

**DANA NESSEL**

Attorney General of Michigan

By: /s/ Neil Giovanatti

Neil Giovanatti  
Danny Haidar  
Assistant Attorneys General  
Michigan Department of Attorney General  
525 W. Ottawa  
Lansing, MI 48909  
(517) 335-7603

[mdrezner@oag.state.md.us](mailto:mdrezner@oag.state.md.us)

*Counsel for the State of Maryland*

**KEITH ELLISON**

Attorney General for the State of  
Minnesota

By: /s/ Lindsey E. Middlecamp

Lindsey E. Middlecamp  
Special Counsel, Rule of Law  
445 Minnesota Street, Suite 600  
St. Paul, Minnesota, 55101  
(651) 300-0711

[Lindsey.middlecamp@ag.state.mn.us](mailto:Lindsey.middlecamp@ag.state.mn.us)

*Counsel for the State of Minnesota*

**RAÚL TORREZ**

Attorney General of New Mexico

By: /s/ Astrid Carrete

Astrid Carrete  
Impact Litigation Counsel  
New Mexico Department of Justice  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508  
(505) 490-4060  
[acarrete@nmdoj.gov](mailto:acarrete@nmdoj.gov)

*Counsel for the State of New Mexico*

**CHARITY R. CLARK**

Attorney General for the State of Vermont

By: /s/ Ryan P. Kane

Ryan P. Kane  
Deputy Solicitor General  
109 State Street  
Montpelier, VT 05609  
(802) 828-2153

[GiovanattiN@michigan.gov](mailto:GiovanattiN@michigan.gov)

[HaidarD1@michigan.gov](mailto:HaidarD1@michigan.gov)

*Counsel for the People of the State of  
Michigan*

**MATTHEW J. PLATKIN**

Attorney General of New Jersey

By: /s/ Justine M. Longa

Justine M. Longa  
Jessica L. Palmer  
*Deputy Attorneys General*  
Office of the Attorney General  
25 Market Street  
Trenton, NJ 08625  
(609) 696-4527  
[Justine.Longa@law.njoag.gov](mailto:Justine.Longa@law.njoag.gov)  
[Jessica.Palmer@law.njoag.gov](mailto:Jessica.Palmer@law.njoag.gov)

*Counsel for the State of New Jersey*

**DAN RAYFIELD**

Attorney General of the State of Oregon

By: /s/ Elleanor H. Chin

Elleanor H. Chin  
*Senior Assistant Attorney General*  
100 Market Street  
Portland, OR 97201  
Tel (971) 673-1880  
Fax (971) 673-5000  
[elleanor.chin@doj.oregon.gov](mailto:elleanor.chin@doj.oregon.gov)

*Counsel for the State of Oregon*

**JOSHUA L. KAUL**

Attorney General of Wisconsin

By: /s/ Charlotte Gibson

Charlotte Gibson  
Assistant Attorney General  
Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857

[Ryan.kane@vermont.gov](mailto:Ryan.kane@vermont.gov)

*Counsel for the State of Vermont*

(608) 957-5218 (phone)

(608) 294-2907 (Fax)

[Charlie.Gibson@wisdoj.gov](mailto:Charlie.Gibson@wisdoj.gov)

*Counsel for the State of Wisconsin*